

Mr. Reich's petition seeks to restore frequency privileges for Novice Amateur Radio Service class licensees. Specifically, the petition requests a restoration of 145.000 MHz to 147.000 MHz that was removed from the Novice class through previous rule making proceedings. While this is a noble gesture, it has little practical value for the Novice licensee given the way the 2 meter band is used today.

By allocating just this amount of spectrum, the Novice class licensee only has access to those repeaters with input frequencies located between 145.000 MHz and 147.000 MHz as well as the recognized simplex channels in this range. Access to the International Space Station uplink frequencies would be prohibited. The value of the Novice licensee to ARES and RACES emergency operations and drills would be very low under this scheme.

The petition also seeks to allocate 28.500 MHz to 28.800 MHz to "all normal HF modes" with an output power of not more than 40 Watts RF. The petition fails to explain why the current allocation of 28.100 MHz to 28.500 MHz does not meet the needs of existing Novice and Technician with HF licensees.

The petition seeks to allocate 51.000 MHz to 52.000 MHz to Novice class licensees, but does not take into account current band usage patterns. For example, the simplex FM calling frequency is 52.525 MHz and weak signal work takes place around 50.100 MHz. Again this allocation would be too limited to be useful.

The petition does have some merit in its assumption that Novice and Advanced class licensees who have held their license more than 20 years may deserve some consideration from the Amateur Radio Service. However, it is left to conjecture just how many Advanced and Novice class licensees would qualify and apply for the "Conditional Merit & Service Upgrade". A significant issue is that qualifying Advanced class licensees that would be issued an Amateur Extra class license would have not been examined on their knowledge of the Volunteer Examiner System, arguably one of the most important functions of the Amateur Extra class licensee today.

This upgrade would create a third division of the Technician class license creating an unnecessary burden on the VEC/VE system for validating documentation of proof of qualification for all upgrades.

Overall, it is my belief that the burden to existing Novice and Advanced class licensees of upgrading through the current Volunteer Examiner system is not as great as the extra burden placed the Commission and the VEC/VE system if this petition were enacted.

Therefore, I recommend that RM-10620 be DISMISSED.